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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11 (Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY DEFAULT  
GRANTING APPLICATION OF DEBTORS  
PURSUANT TO 11 U.S.C. § 327(e), FED. R. BANKR.  
P. 2014(a) AND 2016, AND THE ORDER  
AUTHORIZING THE DEBTORS TO EMPLOY  
PROFESSIONALS USED IN THE ORDINARY  
COURSE OF BUSINESS FOR AUTHORITY TO  
RETAIN AND EMPLOY STEPTOE & JOHNSON  
LLP AS SPECIAL COUNSEL FOR THE DEBTORS  
EFFECTIVE AS OF THE PETITION DATE**

Date: April 14, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

Objection Deadline: April 7, 2020, 4:00 p.m. (PT)

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the  
3 “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-  
4 captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby request, pursuant to Rule 9014-1(b)(4) of  
5 the Bankruptcy Local Rules for the United States District Court for the Northern District of California,  
6 as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain*  
7 *Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case**  
8 **Management Order**”), that the Court enter an order by default on the *Application of Debtors Pursuant*  
9 *to 11 U.S.C. § 327(e), Fed. R. Bankr. P. 2014(a) and 2016, and the Order Authorizing the Debtors to*  
10 *Employ Professionals Used in the Ordinary Course of Business for Authority to Retain and Employ*  
11 *Steptoe & Johnson LLP as Special Counsel for the Debtors Effective as of the Petition Date* filed by the  
12 Debtors on March 24, 2020 [Dkt. No. 6458] (the “**Application**”).

13 **RELIEF REQUESTED IN THE APPLICATION**

14 The Application seeks entry of an order approving the retention of Steptoe & Johnson  
15 LLP (“**Steptoe**”), as the Debtors’ special counsel, pursuant to section 327(e) of the Bankruptcy Code, to  
16 represent the Debtors in connection with the Special Matters described therein, on the terms and  
17 conditions in accordance with Steptoe’s hourly rates and reimbursement policies applicable to the  
18 Debtors, as set forth in the Application and Edelstein Declaration.

19 A proposed order (the “**Proposed Order**”) was attached as **Exhibit A** to the Application.  
20 The order being submitted is different from the Proposed Order attached to the Application in that the  
21 reference to a hearing being held has been deleted.

22 **NOTICE AND SERVICE**

23 A *Notice of Hearing on Application of Debtors Pursuant to 11 U.S.C. § 327(e), Fed. R.*  
24 *Bankr. P. 2014(a) and 2016, and the Order Authorizing the Debtors to Employ Professionals Used in*  
25 *the Ordinary Course of Business for Authority to Retain and Steptoe & Johnson LLP as Special Counsel*  
26 *for the Debtors Effective as of the Petition Date* [Dkt. No. 6461] (the “**Notice of Hearing**”) was filed on  
27 March 24, 2020. The Application, the supporting declarations of Laurie Edelstein and Janet Loduca,  
28 and the Notice of Hearing were served as described in the Certificate of Service of Alan B. Francoeur

1 filed on March 27, 2020 [Dkt. No. 6508]. The deadline to file responses or oppositions to the Application  
2 has passed, and no responses or oppositions have been filed with the Court or received by counsel for  
3 the Debtors.

4 **DECLARATION OF NO RESPONSE RECEIVED**

5 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,  
6 that:

7 1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the  
8 Debtors.

9 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined  
10 that no response or opposition has been filed with respect to the Application.

11 3. This declaration was executed in San Francisco, California.

12 WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in  
13 the form attached to the Application, granting the Application as set forth therein.

14  
15 Dated: April 8, 2020

16 **WEIL, GOTSHAL & MANGES LLP**  
17 **KELLER BENVENUTTI KIM LLP**

18 /s/ Thomas B. Rupp

19 Thomas B. Rupp

20 *Attorneys for Debtors and Debtors in Possession*  
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